

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the Existing)
Television Broadcast Service)

MM Docket No. 87-268

To: The Commission

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COMMENTS IN SUPPORT

On June 13, 1997, Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network ("TBN"), licensee of numerous full power and television translator stations throughout the country, by its attorney, filed a Petition for Reconsideration in response to the Commission's April 21, 1997 Sixth Report and Order in this proceeding.

In its filing TBN sought reconsideration of the DTV allocation scheme and service replication requirement and requested assignment of different paired digital channels for certain full power facilities in order to permit the continued operation of many of TBN's translator facilities. A listing of substitute paired DTV channels based on the May 28, 1997 MST/NAB computer study, "Alternative DTV Channel Assignments in the Continental United States" was the basis of TBN's reconsideration.

Similarly, on June 13, 1997 the Eastern Washington and Northern Idaho DTV Channel Allocation Caucus ("the EWNI Caucus") also filed a Petition for Reconsideration of the DTV allocation scheme and also included a table of substitute allocations in its submission.

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After review of the allocations proposed by the EWNl Caucus, TBN files these comments in support of the alternative paired channels proposed by the EWNl Caucus in the following communities and requests that its proposed table of allocations be modified accordingly.

<u>Community</u>	<u>EWNl Caucus Proposed Channel</u>
Coeur D'Alene	13 or 45
Spokane	13 or 15
Yakima	14

With the exception of the communities and channels noted above TBN continues to request the substitute paired channels specified in its June 13, 1997 Petition for Reconsideration.

Respectfully submitted,

**TRINITY CHRISTIAN CENTER OF SANTA
ANA, INC., D/B/A TRINITY BROADCASTING
NETWORK**

By: 
Colby M. May
Its Attorney

1000 Thomas Jefferson Street, N.W.
Suite 609
Washington, D.C. 20007
(202) 298-6348

July 18, 1997

CERTIFICATE OF SERVICE

I, Glinda M. Corbin, office manager in the law offices of Colby M. May hereby certify that I have caused to be sent this 25th day of July 1997, via first class U.S. mail, postage prepaid, a true and correct copy of the foregoing **COMMENTS IN SUPPORT** to the following:

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Mass Media Bureau
Federal Communications Commission
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Washington, D.C. 20554

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Federal Communications Commission
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Office of Engineering and Technology
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Zaragoza, L.L.P.
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Washington, D.C. 20006
(Counsel for Sinclair Broadcast Group, Inc.)

KMOH-TV
Grand Canyon TV, Co., Inc.
2160 S. Highway 95, Suite 8
Bullhead City, Arizona 86442

KUPN
Channel 21 Partnership
920 S. Commerce Street
Las Vegas, Nevada 89106-4504

KDVR
Fox Television Stations, Inc.
501 Wazee Street
Denver, Colorado 80204

KWGN-TV
KWGN, Inc.
Denver Tech Center
6160 S. Wabash Way
Englewood, Colorado 80111

KUZZ-TV
Buck Owens Production Co., Inc.
3223 Sillect Avenue
Bakersfield, California 93308

KDOC-TV
Golden Orange Broadcasting Co., Inc.
18021 Cowan
Irvine, California 92614-6023

WWSB-TV
Southern Broadcast Corp. of Sarasota
5725 Lawton Drive
Sarasota, Florida 34233

WINK-TV
Fort Myers Broadcasting Co.
2824 Palm Beach Boulevard
Fort Myers, Florida 33916

WVAN-TV
Georgia Public Telecommunications
Commission
1540 Stewart Avenue, S.W.
Atlanta, Georgia 30310

KXLY-TV
Spokane TV, Inc.
500 W. Boone Avenue
Spokane, Washington 99201

KIPT
Idaho State Board of Education
1455 N. Orchard
Boise, Idaho 83706

WILL-TV
Board of Trustees
University of Illinois
1110 W. Main Street
Urbana, Illinois 61801

WMAQ-TV
NBC Subsidiary (WMAG-TV), Inc.
454 N. Columbus Drive
Chicago, Illinois 60611-5555

WJYS
Jovon Broadcasting Corp.
18600 S. Oak Park Avenue
Tinley Park, Illinois 60477

WYCC
Board of Trustees of Community College
226 W. Jackson Boulevard, Suite 922
Chicago, Illinois 60606-6997

WVCY-TV
Wisconsin Voice of Christian Youth
3434 W. Kilbourn Avenue
Milwaukee, Wisconsin 53208

WHBF-TV
Goronet Communications Co.
231 18th Street
Rock Island, Illinois 61201

KCRG-TV
Cedar Rapids Television, Co.
Box 816
Cedar Rapids, Iowa 52406-0816

KLTM-TV
Louisiana ETV Authority
7860 Anselmo Lane
Baton Rouge, LA 70810

KLFY-TV
Young Broadcasting, inc.
2410 Eraste Landry Road
Box 90665
Lafayette, Louisiana 70509

KTVE
Gocom Television of Quachita, L.P.
400 W. Main Street
El Dorado, Arkansas 71730

WCBB
Maine Public Broadcasting Corp.
1450 Lisbon Street
Lewiston, Maine 04240

WABI-TV
Diversified Communications
35 Hildreth Street
Bangor, Maine 04401

WVII-TV
Bangor Communications, Inc.
371 Target Industrial Circle
Bangor, Maine 04401

WJAL
Channel 68 Broadcasting Corp.
Box 229
Chambersburg, Pennsylvania 17201

WNBU
Boston University Communications, Inc.
1660 Soldiers Field
Boston, Massachusetts 02135

WGOT

Paxson Boston License, Inc.
One Sundial Avenue, Suite 501
Manchester, New Hampshire 03103

WNDS

TV 50 Place
Derry, New Hampshire 03038

WVUE

SF Broadcasting of New Orleans, Inc.
1025 S. Jefferson Davis Parkway
New Orleans, Louisiana 70125

KOLR

Independent Broadcasting Co.
Box 1716
Springfield, Missouri 65801

KSDK

Multimedia KSDK, Inc.
Television Plaza
1000 Market Street
St. Louis, Missouri 63101

KXVO

Gary Cocola
4625 Farnam Street
Omaha, Nebraska 68132

KUON-TV

University of Nebraska
1800 N. 33rd Street
Lincoln, Nebraska 68503

WMGM-TV

South Jersey Radio, Inc.
1601 New Road
Linwood, New Jersey 08221

WNYT-TV

Viacom International, Inc.
15 N. Pearl Street
Menands, New York 12204

WNPE-TV

United Communications Corp.
120 Arcade Street
Watertown, New York 13601

WUNC-TV

University of North Carolina
10 T. West Alexander Drive
Research Triangle Park, North Carolina
27709

WYDO

KS Family Television, Inc.
Box 2044
Greenville, North Carolina 27836-0044

WTVD

Capital Cities Communications, Inc.
411 Liberty Street
Durham, North Carolina 27702

WKFT

Delta Broadcasting, Inc.
230 Donaldson Street
Fayetteville, North Carolina 28301

WRAL-TV

Capital Broadcasting Co., Inc.
2619 Western Boulevard
Raleigh, North Carolina 27606

WEAO

Northeastern Educational Television
of Ohio, Inc.
1750 Campus Center Drive
Kent, Ohio 44240-5191

WAOM

Garcia Communications
1569 N. Millard
Rialto, California 92376

WWHO

Fant Broadcasting Co. of Ohio, Inc.
10 S. Paint Street
Chillicothe, Ohio 45601

WDLI

Trinity Broadcasting Network
6600 Atlantic Boulevard
Louisville, Ohio 44641

WOUC-TV

Ohio University
9 South College Street
Ohio University Campus
Athens, Ohio 45701

WTTE

WTTE Channel 28 Licensee, Inc.
Box 280
Columbus, Ohio 43216-0280

KAFT

Arkansas ETV Commission
350 S. Donaghey Street
Box 1250
Vonway, Arkansas 72033

KEZI

KEZI, Inc.
Box 7009
Eugene, Oregon 97401

KOBI

California-Oregon Broadcasting, Inc.
Box 1489
Medford, Oregon 97501

WICU-TV

SJL Communications L.P.
3514 State Street
Erie, Pennsylvania 16508

WNEH

South Carolina ETV Commission
2712 Millwood Avenue
Columbia, South Carolina 29211-1000

WSAV-TV

Elcom of Georgia, Inc.
Box 2429
Savannah, Georgia 31402

WTAT-TV

Sullivan Broadcasting Company, Inc.
4301 Arco Lane
Charleston, South Carolina 29418

KJRE

Prairie Public Broadcasting, Inc.
207 N. 5th Street
Fargo, North Dakota 58102

KDLT

Red River Broadcast Corp.
3600 S. Westport Avenue
Sioux Falls, South Dakota 57116-0196

WVLT-TV

Suite 100
1201 New York Avenue, N.W.
Washington, D.C. 20005

WBIR-TV

Multimedia WBIR, Inc.
Box 27909
Knoxville, Tennessee 37917-3851

KIII

Channel 3 of Corpus Christi, Inc.
Box 6669
Corpus Christi, Texas 78411

KVUE-TV

KVUE-TV, Inc.
3201 Steck Avenue
Austin, Texas 78757

KLRN

Alamo Public Telecommunications Council
801 S. Bowie Street
San Antonio, Texas 78205-3296

KIDY

Sage Broadcasting Corp.
406 S. Irving Street
San Antonio, Texas 76903

WVNY
US Broadcast Group Licensée L.P. II
Box 22
Burlington, Vermont 05402

WVIR-TV
Virginia Broadcasting Corp.
503 E. Market Street
Charlottesville, Virginia 22902

KXLY-TV
Spokane TV, Inc.
500 W. Boone Avenue
Spokane, Washington 99201

KHQ-TV
KHQ, Inc.
Box 8099
Spokane, Washington 99203

KCDT
State Board of Education
1455 N. Orchard
Boise, Idaho 83706


KAPP
Appel Valley Broadcasting Co.
1610 S. 24th Avenue
Yakima, Washington 98902

WKRP-TV
WKRP-TV, Inc.
26 Seneca Hills
Elkview, West Virginia 25701

WMTV
Benedek License Corp.
615 Forward Drive
Madison, Wisconsin 53711

WHA-TV
Board of Regents of University of Wisconsin
System
1866 Van Hise Hall
Madison, Wisconsin 53706

Eastern Washington - Northern Idaho DTV
Channel Allocation Caucus
500 W. Boone Avenue
Spokane, Washington 99201-2497

By: 
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